APPENDIX B

CORRESPONDENCE PERTAINING TO

ENVIRONMENTAL IMPACT STATEMENT

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

IN REPLY
REFER TO

505 Marquette Avenue N.W., Suite 815
Albuquerque, New Mexico 87102

RECEIVED
MAY 16 1983
CERT/T.A.C.

Mr. Edwin Martinez
Governor, Pueblo of Laguna
P. O. Box 194
Laguna, New Mexico 87026

Dear Governor Martinez:

Attached is a summary of the Pueblo's alternative for the reclamation of the Jackpile-Paguate Uranium Mine as proposed in letters dated December 3, 1982, and April 8, 1983. I would appreciate your review of this summary to assure that it accurately presents the Pueblo's proposal for use in the Jackpile-Paguate EIS.

I have placed the Pueblo's alternative into the format being used for the EIS and have expanded portions of the proposal to address issues that were not fully discussed in the letters mentioned above.

Please contact me as soon as possible if this summary does not accurately present the Pueblo's position.

Sincerely yours,

Marc E. Nelson
Task Force Leader

Enclosure

cc:
John Blueyes, CERT
Area Manager, RPRA

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ALTERNATIVE E - LAGUNA PROPOSAL

OBJECTIVES

FUTURE LAND USES:

Livestock grazing, light manufacturing, office space, mining, and major equipment storage.

Specifically excluded are habitation and farming.

RECLAMATION MEASURES:

OPEN PITS:

Backfill the North Paguate pit to flood plain level.

Backfill the South Paguate pit to its original contour.

Backfill the Jackpile pit to ten feet above the groundwater recovery level.

Reduce all backfill slopes to no greater than 3:1.

Use waste dumps J and H excess material obtained from the sloping waste piles, protore, and overburden from waste dumps as backfill.

Cover the backfill material with four feet of overburden and one foot of soil.

Buttress the west side of the Gavilan Mesa highwall with 3.8 million tons on waste. (The top of the highwall may be cut back by blasting.)

Slope the North and South Paguate highwalls to a 3 to 1 slope, and cover with one foot of soil.

Remove all alluvium from the top of the Jackpile highwall and trim the top 15 feet of the highwalls to a 45 degree angle.

Scale all highwalls.

PROTORE STOCKPILES:

Relocate all protore piles to the open pits.

Cover piles with four feet of overburden and one foot of soil.

WASTE DUMPS:

Cover dumps that contain Jackpile sandstone on their outer surface (see table) with four feet of overburden and one foot of soil. Cover any Jackpile sandstone exposed during sloping of waste piles with four feet of overburden.

Cover dumps that do not contain Jackpile sandstone on their outer surface with one foot of soil.

Leave previously revegetated dumps undisturbed (except to reseed and modify slopes, as necessary).

Reduce all slopes on the site to 3:1 or less, with the exception on the Jackpile Pit highwalls.

SITE STABILITY AND DRAINAGE:

Remove all protore and waste material that lies within 200 feet of the Rio Paguate and Rio Moquino. Construct a permanent cement base for the Rio Moquino immediately above its confluence with the Rio Paguate.

Create an artificial watershed divide south of dumps Y, Y-2, and I to inhibit arroyo head cutting, and armor the arroyo north of dump FD-3 (see figure).

Contour furrow all pit areas.

Contour dump slopes so that their toes are convex to prevent the formation of major gullies on the slopes. Slightly slope all dump tops away from their outer slopes. Contour furrow all dump tops and slopes.

Remove waste dump J and protore stockpiles 17-BC and 6-B, to unblock the ephemeral drainage on the south side of the mine. The two blocked drainages on the north and south sides of Gavilan Mesa will remain blocked. The remainder of the site, with the exception of the open pits, would drain to the Rio Paguate and Rio Moquino.

Modify waste dumps as previously discussed.

STRUCTURES:

Construct a cement bulkhead 680 feet below the collar of the P-10 decline and backfill to the surface. Bulkhead and fill the Alpine Mine entry. Backfill vent holes with waste to within ten feet of the surface and place a ten-foot cement surface plug. All other mine entries would be covered by backfilling or have been previously plugged.

Clean up radiological spots along the rail spur until values of twice background are achieved. Remove the Quirk loading dock. Leave the rail spur intact.

Clear the four main roads on the site, and the parking areas for the geology building, Open Pit Offices, P-10 mine buildings, New Shop, and Old Shop of radiologically contaminated material until values of twice background are achieved. These roads and parking areas will remain. Clear all other roads and associated structures of radiologically contaminated material until values of twice background are achieved and recontour these areas to conform to the surrounding terrain.

Remove crusher, tipple, and all mining equipment.

Remove all pumps and cap all water wells.

Clear the Woodrow Mine area of radiologically contaminated material so that radiological values of twice background are achieved and cover with one foot of soil

Clean up the P-10 mine buildings, New Shop, buildings at the employee housing (excluding homes - trailers), until radiological values of twice background are achieved. Leave these buildings and their sewage systems intact. Remove all other buildings, including the employee housing and powder magazine.

REVEGETATION:

Obtain soil from the four existing soil stockpiles, and from the soil borrow areas along the Rio Moquino, and from the east side of Gavilan Mesa. Place one foot of soil on all disturbed areas.

Revegetate all disturbed areas to 90 percent of the species density and diversity of the surrounding undisturbed land. Revegetate with predominantly native grasses and shrubs that are conducive to the grazing of livestock. (See table .)

Prevent grazing for five years following revegetation.

MONITORING:

Fence all of the disturbed acreage.

Modify the monitoring program as shown in table .

Continue monitoring (by Anaconda) of surface water, groundwater, air quality, subsidence, revegetation success, and concentration of toxic elements in revegetation species for a period of ten years following the completion of reclamation activities.

The BLM and BIA would monitor every aspect of the reclamation activities to assure compliance with all reclamation requirements. The Pueblo of Laguna and BIA would control future land use on the site, and would prevent any uses not provided for by this reclamation.

Access prior to and during reclamation would be controlled by Anaconda.

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RECLAMATION COMPLETION:

Reclamation considered complete when the species density and basal cover of the revegetated areas equals or exceeds 90 percent of the density and basal cover of surrounding undisturbed areas but not sooner than ten years following seeding.